

Site: GE Rome  
Break: 17.8  
Other: \_\_\_\_\_

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NOV 13 1987

REF: 4WH-FP

Mr. Jack C. Dozier, P.E., Chief  
Water Protection Branch  
Environmental Protection Division  
GA Dept. of Natural Resources  
Floyd Towers East - Room 1058  
205 Butler Street, S.E.  
Atlanta, Georgia 30334

RE: General Electric Company  
NPDES Permit No. GA0024155

Dear Mr. Dozier:

We have completed our review of the draft permit of October 29, 1987 for the referenced facility and have no objections to the permit at this time. This decision is contingent upon the agreement of EPD to revise the PCB limitations upon completion of General Electric's on-going PCB Abatement, Engineering, and Pilot Study. We also anticipate the inclusion of this facility and its receiving water on the State's "304 (1)" lists.

We would like to take this opportunity to comment on the PCB limitation to be incorporated into the permit once the study is completed. The limitation should insure that human health is protected. The Georgia Toxic Control Guidance Document for Protection of Water Quality proposes to use the Food and Drug Administration (FDA) tolerance limit for PCBs as guidance for setting limitations. This approach as presented below would lead to a PCB limitation on the order of 0.48 ug/l.

$$\text{Instream Concentration} \times \text{Bioconcentration Factor} \leq \text{FDA tolerance limit}$$

Per the Ambient Water Quality Criteria for PCB document (EPA 440/5-80-068),

FDA tolerance limit = 5.0 mg/kg (ppm)

Bioconcentration Factor = 10,400\*

Instream Concentration = 0.48 ug/l  
(effluent limitation)

\*geometric mean of normalized bioconcentration factors, pg. B-9 of above referenced document

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If the flow of the discharge and receiving stream is known, further calculations can be made to derive a limitation which considers available dilution of the receiving stream. Also, Georgia EPD may "fine-tune" the bioconcentration factor to "best fit" the biota found in the receiving water.

Please keep us advised on the status of the study and permit. If there are any questions, please contact Darlene Vincent at 347-3012.

Sincerely yours,

John T. Marlar, Chief  
Facilities Performance Branch  
Water Management Division

bcc Drew Peake /